

Roger H. Hoole 5089
HOOLE & KING, L.C.
Attorneys for Plaintiffs
4276 South Highland Drive
Salt Lake City, Utah 84124
Telephone: (801) 272-7556
Facsimile: (801) 272-7557
rogerh@hooleking.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN BROADBENT; GINA ROHBOCK; NOLAN BARLOW; JASON BLACK; MAY MUSSER; HOLLY BISTLINE; LAWRENCE BARLOW; STEVEN DOCKSTADER; MARVIN COOKE; HELEN BARLOW; VERGEL BARLOW; CAROLE JESSOP; BRIELL LIBERTAE DECKER f/k/a, LYNETTE WARNER; AMY NIELSON; SARAH ALLRED; THOMAS JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION OF
HOLLY BISTLINE**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Holly Bistline, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 26, 2022.

5. Based on my fraud claims against Warren Jeffs and my trial testimony, I suffered damages as summarized in this Damages Declaration.

6. After my first husband was sent away and I was directed to divorce him and placed by Jeffs in an arranged, plural marriage with my second husband, I helped feed and care for my second husband's three children in addition to my own seven children. I was not paid for helping care for the other children.

7. During my second arranged marriage, I was also directed to sew clothing for the Bishop's Storehouse, located in Hildale, Utah, which required me to travel from my home in Colorado City, Arizona to the storehouse. I was not paid for any of my work for the storehouse.

8. After two of my boys were taken away and placed in Boys Home in Utah for non-United Order boys, I spent a great deal of time cleaning that home, making meals and feeding the 17 boys living there, as well as doing their laundry. I was not paid for any of my work at this Boys Home.

9. If I had refused to provide any of this labor for Jeffs' benefit without compensation or if I had dared to ask for compensation, I would have been corrected and very likely sent away from my family much like my first husband, and my family would have been further destroyed.

10. I estimate that during my second arranged marriage, I worked on average 20 hours a week taking care of my second husband's children, sewing for the storehouse and caring for the 15 other non-member boys in the Boys House—all without any pay.

11. I conservatively calculate my monthly lost wages using the current minimum wage of \$7.25 an hour at \$580 (\$7.25 x 20 hours x 4 weeks). This monthly loss ran for 120 months from my second marriage in January 2004 until I left the FLDS in December 2013.

12. During the period from January 2004 through December 2013 for which I am claiming lost wages, I had basic housing and some food provided by the FLDS Church.

13. The value of the standard of living that I experienced during this period should be fully setoff against the higher wages that I should have been paid until I left the FLDS, especially considering that I am only claiming a rate of \$7.25 an hour to calculate my forced donations.

14. I estimate the value of the necessities I received while a plural wife at \$300 a month over 10 years (\$300 x 120 months) for a total of \$36,000, which total amount may, in the Court's discretion, be deducted from my economic damages.

15. My economic damages after deductions for the necessities provided to me (\$69,600 - \$36,000), therefore, amount to \$33,600.

16. In terms of general or non-economic damages, I testified at trial about what I went through, including losing my first husband and the father of my oldest four children, being placed in an abusive, plural marriage with my second husband, having two of my boys taken from me until I was able to escape with them and losing permanently my oldest son, Derek. Based on that, I ask for general damages in the amount of \$2,000,000.

17. Therefore, I estimate that my total economic and non-economic damages are at least (\$33,600 + \$2,000,000) \$2,033,600.

18. Finally, I request an award of punitive damages in an amount equal to my total economic and non-economic damages.



Holly Bistline